

SCURA, WIGFIELD, HEYER & STEVENS, LLP
1599 Hamburg Turnpike
Wayne, New Jersey 07470
Telephone: 973-696-8391
Facsimile 973-696-8671
Christopher J. Balala (Attorney ID 030732010)
Counsel for Debtor

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

Myriame Duplan,

Debtor.

Chapter 13
Case No. 16-16594-VFP

**CERTIFICATION OF COUNSEL IN OPPOSITION TO CREDITOR'S
APPLICATION FOR EARLY TERMINATION OF LOSS MITIGATION**

I, Christopher Balala, hereby certify as follows:

1. I represent Myriame Duplan ("The Debtor") in the above captioned Chapter 13 case, and as such, I have personal knowledge of the facts recited herein.
2. I submit this certification in opposition to Ditech Financial LLC's ("Ditech") Application for Early Termination of Loss Mitigation.
3. On April 5, 2016 the Debtor filed a voluntary petition for relief pursuant to Chapter 13, Title 11 of the United States Bankruptcy Code.
4. On April 26, 2016 this Court entered the Loss Mitigation Order allowing loan modification negotiations to commence.
5. On July 26, 2016 an Order extending loss mitigation until October 26, 2016 was granted.

6. On October 26, 2016 an Order extending loss mitigation until January 26, 2017 was granted.

7. On February 2, 2017 an Order extending loss mitigation until April 26, 2017 was granted.

8. On February 23, 2017, Ditech filed an Application for Early Termination of Loss Mitigation because “the complete package required to advance loss mitigation has not been provided.”

9. The Debtor has submitted most of the requested documents.

10. The remaining documents will be submitted by the Debtor, prior to the hearing date or sooner if possible.

11. The lender will have adequate time to review the application prior to the April 26, 2017 deadline.

12. Debtor is current on all Adequate Protection Payments.

Therefore, the Debtor requests the Court deny Ditech’s Application for Early Termination of Loss Mitigation.

/s/ Chirstopher J. Balala
Christopher J. Balala, Esq.

Dated: February 27, 2017